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E-filed 3/22/07

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15 Co-Lead Counsel for Plaintiffs

16 UNITED STATES DISTRICT COURT

17 NORTHERN DISTRICT OF CALIFORNIA

18 SAN JOSE DIVISION

19 In re TRIDENT MICROSYSTEMS, INC.,) Master File No. C06-3440-JF
20 DERIVATIVE LITIGATION)
21 _____) STIPULATION AND [PROPOSED] ORDER
22 This Document Relates To:) CONTINUING CASE MANAGEMENT
23 ALL ACTIONS.) CONFERENCE AND SETTING HEARING
24) DATE FOR NOMINAL DEFENDANT
25) TRIDENT MICROSYSTEMS, INC.'S
26) MOTION TO DISMISS
27
28

1 WHEREAS, lead plaintiffs filed their First Amended Consolidated Verified Shareholder
2 Derivative Complaint ('Amended Complaint') on March 7, 2007;

3 WHEREAS, pursuant to this Court's February 9, 2007 Order, nominal defendant Trident
4 Microsystems, Inc.'s ('Trident') response to the Amended Complaint will be due no later than April
5 16, 2007, and in the event that Trident responds by a motion to dismiss the Amended Complaint for
6 failure to plead that making a demand would have been futile (pursuant to Fed. R. Civ. P. 23.1), lead
7 plaintiffs shall file and serve their opposition within forty-five (45) days after service of Trident's
8 motion, and Trident shall file and serve a reply to lead plaintiffs' opposition within fifteen (15) days
9 after service of the opposition; and

10 WHEREAS, the parties have met and conferred and believe the interest of judicial economy
11 will be served by continuing the case management conference currently scheduled on March 23,
12 2007 at 10:30 a.m. to July 12, 2007 at 10:30 a.m., or as soon thereafter as the Court's calendar
13 permits, and setting the hearing on Trident's Motion to Dismiss for July 12, 2007 at 9:00 a.m., or as
14 soon thereafter as the Court's calendar permits.

15 THEREFORE IT IS STIPULATED AND AGREED that:

16 1. The case management conference scheduled on March 23, 2007 at 10:30 a.m. is
17 continued until July 12, 2007 at 10:30 a.m.

18 || 2. The hearing on Trident's Motion to Dismiss is set for July 12, 2007 at 9:00 a.m.

19 | DATED: March 21, 2007

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17 Co-Lead Counsel for Plaintiffs

18 I, MONIQUE C. WINKLER, am the ECF User whose ID and password are being used to
19 file this STIPULATION AND [PROPOSED] ORDER. In compliance with General Order 45,
20 X.B., I hereby attest that JEFFREY S. FACTER has concurred in this filing.

21 DATED: March 21, 2007

22 SHEARMAN & STERLING LLP
23 JEFFREY S. FACTER
24 JUSTIN S. CHANG

25 _____/s/
26 JEFFREY S. FACTER

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27 Counsel for Defendant Frank C. Lin
28

1 I, MONIQUE C. WINKLER, am the ECF User whose ID and password are being used to
2 file this STIPULATION AND [PROPOSED] ORDER. In compliance with General Order 45,
3 X.B., I hereby attest that JIN H. KIM has concurred in this filing.

4 DATED: March 21, 2007

HOWARD RICE NEMEROVSKI CANADY
FALK & RABKIN, A Professional Corporation
SARAH A. GOOD
JIN H. KIM

6 _____/s/

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11 Herng Chang, Peter Jen, Gerry Liu, John Luke,
12 Amir Mashkoori, Millard Phelps, and W. Stephen
Rowe and specially appearing for Yasushi
Chikagami

13 I, MONIQUE C. WINKLER, am the ECF User whose ID and password are being used to
14 file this STIPULATION AND [PROPOSED] ORDER. In compliance with General Order 45,
15 X.B., I hereby attest that THOMAS G. ALLEN has concurred in this filing.

16 DATED: March 21, 2007

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1 I, MONIQUE C. WINKLER, am the ECF User whose ID and password are being used to
2 file this STIPULATION AND [PROPOSED] ORDER. In compliance with General Order 45,
3 X.B., I hereby attest that DAVID PRIEBE has concurred in this filing.

4 DATED: March 21, 2007

DLA PIPER RUDNICK GRAY CARY
DAVID PRIEBE

5 _____/s/
6 DAVID PRIEBE

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18 Counsel for Nominal Defendant Trident
19 Microsystems, Inc.

20 * * *

21 **O R D E R**

22 IT IS SO ORDERED.

23 DATED: 3/22/07

24 THE HONORABLE JEREMY FOGEL
25 UNITED STATES DISTRICT JUDGE

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CERTIFICATE OF SERVICE

2 I hereby certify that on March 21, 2007, I electronically filed the foregoing with the Clerk of
3 the Court using the CM/ECF system which will send notification of such filing to the e-mail
4 addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I have
5 mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF
6 participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on March 21, 2007.

/s/
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Mailing Information for a Case 5:06-cv-03440-JF

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Manual Notice List

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- (No manual recipients)